

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

FEB 19 2014

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ASHLEY SLINKARD,

Defendant.

Case No.

**4:14CR0044 CDP/TCM**

**INDICTMENT**

**COUNT ONE**

**Mail Fraud**

The Grand Jury charges that:

1. At some time unknown to the Grand Jury but by at least November 24, 2010 and continuing until at least December 21, 2012, the defendant devised a scheme and artifice to defraud and to obtain money from Edwards Jones Investments ("EJI") by means of false and fraudulent promises, pretenses and representations.

2. The defendant was employed with EJI for approximately five years. In her employment at EJI, the defendant held a leadership role in the Human Resource department. Specifically, her job involved recruiting new employees for EJI. As part of her duties, she regularly incurred certain reimbursable business expenses. Some expenses were billed by the vendors directly to EJI, but other expenses were charged to a credit card issued to the defendant through EJI.

3. It was part of the scheme to defraud that the defendant exploited her position with EJI by falsifying expense claims. Typically, the defendant would locate an old legitimate receipt and use either Excel or Word to create a look-alike falsified receipt. It was part of the scheme to defraud that the defendant created false and fraudulent expense claims and falsely represented to

EJI that valid expenses were incurred and that EJI had received the benefit of the product or service described in said claim and that the claims were properly payable as a valid expenditure of EJI funds. Specifically, the defendant used an online program contained on the EJI intranet to create a claim form. The defendant typed in the information to the claim form, submitted it, and then printed a hard copy to which she attached the falsified receipt.

4. It was part of the scheme to defraud, that after the defendant provided the false and fraudulent claim to EJI that EJI would approve the claim. After the claim was approved, EJI normally made a direct deposit payment to the defendant's EJI money market account. The defendant then used the money in the money market account for her personal benefit. Specifically, on multiple occasions, the defendant made mortgage payments to Chase Bank from the money market account using mailed checks.

5. It was part of the scheme to defraud that the defendant embezzled a total of approximately \$30,000 for her own personal benefit and use.

6. On or about December 4, 2012 within the Eastern District of Missouri, for the purpose of executing the foregoing scheme and artifice to defraud and to obtain money or property and attempting to do so,

**ASHLEY SLINKARD,**

the defendant herein, did knowingly and willfully cause to be sent, from Saint Louis County, Missouri, by means of the United States Postal Service, an envelope containing check no. 130288113 drawn upon the defendant's EJI money market account, which contained fraudulent funds from a false and fraudulent claim form that the defendant submitted to EJI on November

29, 2012, in the amount of \$2,139.85 to Chase Home Mortgage located in Columbus, Ohio for payment on the defendant's home mortgage.

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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DIANNA R. COLLINS  
Assistant United States Attorney